



**Solutia Inc.**  
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December 11, 2000

Mr. Michael McAteer  
U. S. EPA - Region 5  
77 West Jackson Boulevard (SR-6J)  
Chicago, Illinois 60604-3590

**Re: Sauget Sites Area I - January 21, 1999 Administrative Order by Consent (AOC)**  
• **December 2000 Monthly Report**

Dear Mr. McAteer,

Enclosed is the December 2000 Monthly Report for Sauget Sites Area I. This submittal is in fulfillment of the monthly requirements of Section 2.4 Reporting, of the January 21, 1999 Final Administrative Order by Consent for Sauget Sites Area I, Sauget and Cahokia, Illinois.

Sincerely,

D. M. Light  
Manager, Remedial Projects  
Solutia Inc.

**cc:** T. Gouger - USACE  
C. Morin - IEPA  
Sauget File - Solutia  
Village of Sauget - % P. H. Weis & Associates ( Attn: Brian Nelson)  
Kevin de la Bruere - USF&W  
Michael L. Henry - IDNR  
Tom Long - Cahokia Consultant (% Sapphire Group)  
Dave Webb - IDPH  
Mayor J. Livigni - Cahokia, IL  
Mayor P. Sauget - Sauget, IL

## **Sauget Sites Area I - Sauget, Illinois**

### **AOC - EECA / RIFS**

#### **Monthly Report**

**Date of Report:** December 11, 2000  
**Period Covered:** November 1, 2000 - November 30, 2000  
**Next Report Period:** December 1, 2000 - December 31, 2000

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#### **Work Performed during the reporting period**

All required field work for the Sauget Area 1 Support Sampling Plan ("SSP") was completed prior to this report period. During the month of November, the Sauget Area I Project Team continued to focus on data interpretation and initial preparation of the Data Report and Risk Assessments. Preliminary work was also initiated on the EE/CA and RI/FS reports.

There are no Technical Memos attached to this report.

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#### **Data Submittal**

1. There is no data submitted in this report. All project data has been submitted in previous monthly reports.

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#### **Work scheduled for next reporting period**

The Work during December will focus on preparation of first draft Ecological and Human Health Risk Assessments for internal reviews. Work will also continue on preparation of the EE/CA and RI/FS reports.

The next AOC required submittal is the Data Report, due January 9, 2001. It is Solutia's intent to submit Site Characterization Report, the Human Health Risk Assessment and the Ecological Risk Assessment on January 9, 2001 also.

Future AOC required submittals include:

- EE/CA Report - March 9, 2001
  - RI/FS Report - April 9, 2001
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**Problems and Solutions**

NONE

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**Submittal Schedule Status**

See attached schedule - consistent with the approved SSP - as revised where indicated.

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**Other Issues****May 31, 2000 UAO**

A related UAO was issued to Solutia by USEPA on May 31, 2000, requiring construction of an on-site containment cell, removal of affected creek bed sediments and soils and flood plain soils from specific sections of Dead Creek, and placement of the affected sediments and soils in the newly constructed on-site cell. A Time Critical Removal Action Work Plan ("TCRAWP") was submitted to the Agencies June 30, 2000 for review and approval. Agreement on the major aspects of the TCRAWP was achieved in November. Final Approval of the TCRAWP and issuance of the Request-for-Proposal for the cell construction is planned for December.

Work on this UAO began in the field in early November. The site command complex was constructed in November. In addition, installation of facilities (piping and pumps) to de-water the sediments over the next several months, while the containment is being constructed, was initiated and about 20 percent completed in November. The de-watering facilities' installation will be completed in December.

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**Comments:**

NONE

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**January 21, 1999 Sauget Area I AOC**  
**SCHEDULE**

**(11/99 Revision)**

- |   |   |
|---|---|
| 1. Designation of Contractor                            | Completed 3/10/99 <sup>1</sup>  |
| 2. Designation of Other Contractors                     | 5 Business Days Before Start<br>of Work   |
| 3. Designation of Project Coordinator                   | Completed   |
| 4. Submit Support Sampling Plan (SSP)                   | Submitted February 22, 1999   |
| 5. Submit Revised SSP                                   | April 8, 1999 <sup>2</sup><br>June 25, 1999 <sup>3</sup><br>August 13, 1999 <sup>4</sup><br><b>October 9, 1999<sup>5</sup> Approval</b> |
| 6. Obtain Access Agreements                             | July 1, 1999 <sup>6</sup><br>October 17, 1999 <sup>7</sup><br>October 1, 1999 <sup>8</sup>  |
| 7. Submit Health and Safety Plan (HASP)                 | Approved October 9, 1999  |
| 8. Submit Quality Assurance and<br>Sampling Plan (QAPP) | Approved October 9, 1999  |

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<sup>1</sup> Per March 10, 1999 memo DML to M. McAteer re "Notification of Contractors and Contractor Qualifications"

<sup>2</sup> Per 3/19/99 e-mail from M. McAteer to M. Light, AOC schedule modified to "21 days after receipt of U. S. EPA comments from the February 22, 1999 SSP submittal". U. S. EPA comments on the 2/22/99 SSP submittal were received 3/19/99. Revised SSP submitted to U. S. EPA April 8, 1999 and disapproved June 3, 1999.

<sup>3</sup> April 8, 1999 SSP submittal disapproved June 3, 1999. Revised plan due to the Agency June 25, 1999. Revised plan submitted June 25<sup>th</sup> as required.

<sup>4</sup> June 25<sup>th</sup> SSP submittal disapproved July 16, 1999 and resubmitted August 13, 1999.

<sup>5</sup> August 13, 1999 SSP submittal as revised August 30, 1999 and October 7, 1999 received final Agency approval on October 9, 1999.

<sup>6</sup> Per 5/21/99 phone call from M. McAteer to M. Light, AOC schedule modified to "July 1, 1999 with interim report due on June 15, 1999", consistent with Solutia's request in a May 18, 1999 Access report and request for extension.

<sup>7</sup> Access agreements update issued August 15, 1999 with request to extend deadline to October 17, 1999. Extensions to October 17, 1999 was granted by Mike McAteer in an August 17, 1999 e-mail to Mike Light.

<sup>8</sup> Access agreements update issued October 17, 1999 with request to extend deadline to October 1, 1999. Extensions to October 1, 1999 was granted by Mike McAteer in a October 21, 1999 e-mail to Mike Light

**January 21, 1999 Sauget Area I AOC**

**SCHEDULE (Cont.)**  
**(11/99)**

9. Sampling Notification	10 Business Days Prior to Start of Work <sup>9</sup>
10. Submit Data Report	01/09/01 <sup>10</sup>
11. Submit EE/CA Report	60 Calendar Days After Data Report Submittal - 03/09/01
12. Submit Revised EE/CA Report	21 Calendar Days After Receipt of EPA Comments
13. Submit RI/FS Report	90 Calendar Days After Data Report Submittal - 04/09/01
14. Submit Revised RI/FS Report	21 Calendar Days After Receipt of EPA Comments
15. Progress Reports	Monthly Beginning February 19, 1999 <sup>11</sup>

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<sup>9</sup> Notification given on August 19, 1999 that Air Sampling will begin on October 7, 1999. Per 9-2-99 phone conversation with Mike McAteer, the 10 day notification requirement can be treated as a "Day 1" requirement only, which has already been met.

<sup>10</sup> Per SSP - 16 mo. from SSP approval date of 9/9/99.

<sup>11</sup> Pursuant to decisions in 9-1-99 EPA Kickoff Meeting - Report period for the monthly report will be changed to the calendar month to coincide with project field work - due on the 10<sup>th</sup> of the month.